

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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UNITED STATES OF AMERICA, *ex rel.*

ANTONI MUHAWI,

Plaintiff,

v.

Case No.: 18-CV-02022  
Hon. Manish S. Shah

PANGEA EQUITY PARTNERS,  
PANGEA EQUITY PARTNERS, LP,  
PANGEA EQUITY PARTNERS II, LP,  
PANGEA PROPERTIES,  
PANGEA VENTURES, LLC,  
PANGEA REAL ESTATE, and  
PANGEA REAL ESTATE HOLDINGS, LLC,

Defendants.

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**JOINT STATUS REPORT**

Pursuant to this Court’s Order (Dkt. No. 107), counsel for Antoni Muhawi (“Relator”), and counsel for Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate, and Pangea Real Estate Holdings, LLC (together, the “Pangea Defendants”) (collectively, Relator and the Pangea Defendants are referred to as the “Parties”) conferred on October 20, 2023 (the “Rule 26 conference”) regarding planning for discovery, and they hereby submit the following Joint Status Report. Because of the procedural history and posture of this case, the Parties do not address the nature of the case.

**I. PENDING MOTIONS AND CASE PLAN**

**a. Identify all pending motions.**

- There are no pending motions.

**b. Submit a proposal for a discovery plan, including the following information:**

**i. The general type of discovery needed;**

- The Parties intend to conduct written discovery (document requests, interrogatories, and requests for admissions), exchange document productions, conduct party and non-party depositions, and pursue any other discovery permitted by the Federal Rules of Civil Procedure.

**ii. A date for Rule 26(a)(1) disclosures;**

- Fourteen (14) days after the Rule 26 conference, which is November 3, 2023.

**iii. A date to issue written discovery;**

- Fourteen (14) days after the Rule 26 conference, which is November 3, 2023. The Parties agree that this date is for initial written discovery and that additional written discovery may be served following this date.

**iv. A fact discovery completion date;**

- May 31, 2024.

**v. If there will be expert discovery, an expert discovery completion date, including dates for the delivery of expert**

**reports; and**

- The Parties propose the following expert disclosure schedule: within fourteen (14) days following the close of fact discovery, the Parties will exchange the names of their experts, the general areas on which each will testify, and a copy of the experts' CV (June 14, 2024); within forty-five (45) days following the close of fact discovery, the Parties will exchange opening expert reports (July 15, 2024); forty-five (45) days following the exchange of expert reports, the Parties will exchange rebuttal expert reports (August 29, 2024); expert discovery will close thirty (30) days after the exchange of rebuttal expert reports (September 30, 2024).

**vi. A date for the filing of dispositive motions.**

- Relator will file any dispositive motions thirty (30) days after the close of expert discovery (October 30, 2024). Pursuant to the Court's text order (Dkt. No. 84), the Pangea Defendants may not file another summary judgment motion.

**c. With respect to trial, indicate whether a jury trial is requested and the probable length of trial.**

- The Parties request a jury trial and estimate that the probable length of trial will be eight (8) to ten (10) days.

**II. CONSENT TO PROCEED BEFORE A MAGISTRATE JUDGE**

- a. Indicate whether the parties consent unanimously to proceed before a Magistrate Judge.**
- The Parties do not consent to proceed before a Magistrate Judge.

**III. STATUS OF SETTLEMENT DISCUSSIONS**

- a. Indicate whether any settlement discussions have occurred;**
- No settlement discussions have occurred to date.
- b. Describe the status of any settlement discussions; and**
- N/A.
- c. Whether the parties request a settlement conference.**
- Not at this time.

Dated: October 26, 2023

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